

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CIVIL NO. 1:14-cv-243

RICHARD H. HARTMAN, II,)

Plaintiff,)

v.)

CHARTER COMMUNICATIONS,)

INC.; CHARTER)

COMMUNICATIONS, LLC.;)

CHARTER COMMUNICATIONS)

(NC), LLC.; CHARTER)

COMMUNICATIONS VI, LLC.;)

CHARTER COMMUNICATIONS)

VII, LLC.; CHARTER)

COMMUNICATIONS HOLDING)

COMPANY, LLC.; CHARTER)

CABLE OPERATING COMPANY,)

LLC.)

Defendants.)

**DEFENDANTS' RESPONSE
TO PLAINTIFF'S MOTION FOR
LEAVE TO FILE AMENDED
COMPLAINT**

Defendants hereby submit their response to Plaintiff's Motion for Leave to File an Amended Complaint. In his brief in support of said motion, Plaintiff states that he offered Defendants the opportunity to substitute the newly proposed Defendant, Straight Forward of Wisconsin, Inc., for the current Defendants named in this lawsuit. *See* ECF Docket No. 12-1, at 2. The current Defendants and their counsel do not recall receiving this offer prior to Plaintiff's motion. However,

Defendants in this case would agree to a substitution of the proposed additional Defendant, Straight Forward of Wisconsin, Inc., for all current Defendants in this lawsuit.

In addition, Defendants do not agree with Plaintiff's resuscitation of the facts of this case as Defendants have fully cooperated with Plaintiff throughout this case and have provided Plaintiff with requested information and documents as required by the rules of this Court. Although Defendants do not support Plaintiff's motion, as Plaintiff appears to be requesting this Motion in good faith, Defendants cannot object to the Court granting Plaintiff's request if the Court deems it appropriate.

This the 29th day of January, 2015.

CRANFILL, SUMNER & HARTZOG, LLP

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Communications, LLC, and Charter
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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the attached *Response* on all of the parties to this cause by:

Electronically filing the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Richard H. Hartman
185A Weston Road
Arden, NC 28704
Tel: 813-486-8287
Email: rick@rickhartman.com

This the 29th day of January, 2015.

CRANFILL SUMNER & HARTZOG LLP

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